

EXHIBIT A

ORIGINAL

VOLUME: II
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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

DOCKET NO. 04 11572 JLT

SUSAN COONEY,)
Plaintiff,)
vs.)
)
HUMANISTIC PSYCHOLOGY INSTITUTE,)
d/b/a SAYBROOK INSTITUTE and)
MAUREEN O'HARA, Individually,)
Defendants.)

AUDIOVISUAL DEPOSITION OF SUSAN COONEY, taken
on behalf of the Saybrook Institute, pursuant to the
Federal Rules of Civil Procedure, before Kristin L.
Tucker, Notary Public and Certified Shorthand Reporter
within and for the Commonwealth of Massachusetts, at the
Law Offices of Morrison Mahoney LLP, 250 Summer Street,
Boston, Massachusetts, on January 27, 2006, at 9:10
a.m., as follows:

DANILECKI REPORTING
234 Governors Road
Quincy, Massachusetts 02169
(617) 745-9786

1 A. I think Vartain discussed that. She was a
2 writing instructor at Saybrook.

3 Q. Okay. And in looking at Exhibit Number 26,
4 this is your sworn statement that you signed on the
5 fourth page, correct?

6 A. (Witness reviewing document.) Yes. Yes.

7 Q. And in -- Right under A on Page 1, are those
8 the only damages that you seek against Saybrook
9 Institute and Dr. O'Hara?

10 A. I'm sorry. Could I ask you to repeat it?

11 Q. Yes. In Paragraph A on Page 1, are those the
12 only damages that you're seeking against the defendants
13 in this case?

14 A. Okay. May I read it a moment?

15 Q. Absolutely.

16 A. (Witness reviewing document.) No. I think
17 in addition, the emotional component has been
18 incorporated.

19 Q. Okay. The emotional component. What
20 component is that?

21 A. The terrible loss that it's been to my life,
22 and the dreams that I had and what I wanted to do with
23 my life for the next 30 years that I can no longer do.
24 And it's caused me to have a bit of depression, a bit of